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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 11-00558 LHK
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	ORDER EXCLUDING TIME
v.	)	
	)	
MICHAEL LEON RUELAS and	)	
LORENZO ISRAEL GARCIA,	)	
	)	
Defendants.	)	

UNITED STATES OF AMERICA,	)	No. CR 11-00559 EJD
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
LORENZO ISRAEL GARCIA,	)	
	)	
Defendant.	)	

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1 UNITED STATES OF AMERICA,

No. CR 11-00560 DLJ

2 Plaintiff,

3 v.

4 MICHAEL LEON RUELAS,

5 Defendant.

6  
7 UNITED STATES OF AMERICA,

No. CR 11-00706 DLJ

8 Plaintiff,

9 v.

10 MIGUEL ANGEL GONZALEZ and  
11 MICHAEL LEON RUELAS,

12 Defendants.

13 On November 3, 2011, the court ordered the above cases related pursuant to  
14 Criminal Local Rule 8-1. The first case, charging defendants MICHAEL LEON RUELAS (CR  
15 11-00558 LHK) was set for November 16, 2011 before Judge Koh. His co-defendant,  
16 LORENZO ISRAEL GARCIA is set for December 7, 2011, also before Judge Koh. The  
17 remaining captioned cases are scheduled before Judges Jensen and Davila.

18 The cases were all put over so that so that the discovery process could be  
19 commenced and defense counsel would have sufficient time to review the materials and confer  
20 with their clients. However, in order to comply with Local Rule 8-1, the cases must be  
21 consolidated to the same dates. Moreover, discovery is still not complete. The parties therefore  
22 hereby stipulate and agree to continue the matters until December 14, 2011, and to exclusions of  
23 time under the Speedy Trial Act, and that said exclusions of time are appropriate based on the  
24 defendants' need for effective preparation of counsel.

25  
26 SO STIPULATED:

MELINDA HAAG  
United States Attorney

27  
28 DATED: November 16, 2011

/s/  
THOMAS M. O'CONNELL  
Assistant United States Attorney

1 DATED: November 16, 2011

\_\_\_\_\_/s/\_\_\_\_\_  
DIANA WEISS  
Counsel for Gonzalez

3 DATED: November 16, 2011

\_\_\_\_\_/s/\_\_\_\_\_  
LARA VINNARD  
Counsel for Ruelas

5 DATED: November 16, 2011

\_\_\_\_\_/s/\_\_\_\_\_  
JACK GORDON  
Counsel for Gonzalez

8           Accordingly, for good cause shown, the Court HEREBY ORDERS that the  
9 above cases are continued until December 14, 2011. The Court further finds that based on the  
10 defendant's need for effective preparation of counsel, the ends of justice served by granting the  
11 requested continuance outweigh the interest of the public and the defendant in a speedy trial.  
12 The failure to grant the requested continuance would deny defense counsel reasonable time  
13 necessary for effective preparation, taking into account the exercise of due diligence, and would  
14 result in a miscarriage of justice. The Court therefore concludes that this exclusion of time  
15 should be made under 18 U.S.C. §§ 3161(h) (7)(B)(iv).

17 SO ORDERED.

19 DATED: 11/17/11

  
\_\_\_\_\_  
LUCY H. KOH  
United States District Judge